

cc: file
MOTION TO COMPEL
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- Request Policies: 420.2; 030.1; 030.4; 135.1; 030.1; and 160.2 or 350.2 and 420.1
- E. RASNICK's medical record prior to 8/14/15, incident

dated: 6/12/18

Sherry Wall #1133749
CLERK OF U.S. DIST. COURT
AT ROANOKE, VA
FILED

DECLARATION IN SUPPORT OF
MOTION TO COMPEL "SPECIFIC" DISCOVERY

JUN 18 2018

JULIA C. DUDLEY, CLERK
BY: [Signature]
DEPUTY CLERK

Mr. Gary Wall #1133749, declares under the penalty of perjury:

1. I am the plaintiff in this case. I make this affidavit in support of my motion to compel discovery.
2. On APRIL 16th 2018, I served on the defendants' Counsel an initial Request for Production of Documents, which is on record as ECF. no. 43.
3. Defendants responded "Partially" to this request on or about MAY 16th 2018.
4. On MAY 31st 2018, Plaintiff served on defendants' Counsel a SECOND Request for Production of Documents, which was served on or about MAY 13th 2018, in an attempt to resolve the dispute informally as required by local Rule before the Court ORDERED ~~production~~ production JUNE 25th 2018, Discovery Dead-line to record as ECF. no. 44.
5. Defendants Objected to each request either on the grounds that the discovery sought is irrelevant, burdensome, and Privileged or having no merit or grounds under Rule 26(b)(1), that permits discovery "If the discovery appears reasonably calculated to lead to the discovery of admissible evidence" and each item sought by Plaintiff is relevant to the claims and defenses in this case.

CONCLUSION

For the foregoing reasons, the Court should GRANT Plaintiff's MOTION to Compel "Specific" Discovery.

dated: 6/12/18

Sherry Wall #1133749
Respectfully Submitted

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of JUNE 2018, I mailed the foregoing: MOTION TO COMPEL "SPECIFIC" DISCOVERY with DECLARATION IN SUPPORT, to respondents: UNITED STATES DISTRICT COURT CLERK, 210 FRANKLIN ROAD, S.W. Suite 540, ROANOKE, VIRGINIA 24011-2200, by First Class mail.

Sherry Wall #1133749
Respectfully Submitted